



Radio Technical Commission for Maritime Services

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of)

Wireless Telecommunications Bureau Seeks)
Comment on MariTEL, Inc. Proposal to Serve)
as Automatic Identification System (AIS))
Frequency Coordinator)

DA 03-3669

December 10, 2003

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COMMENTS OF THE RADIO TECHNICAL COMMISSION FOR MARITIME SERVICES (RTCM)

The Radio Technical Commission for Maritime Services (RTCM) respectfully submits these comments in response to the request for comments in the Commission's Public Notice released November 19, 2003, regarding MariTEL's proposal to serve as the Automatic Information System (AIS) frequency coordinator.

RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime telecommunications practices, needs and technologies with a view toward improving the efficiency and capabilities of maritime telecommunications services, suggesting ways to keep rules and regulations to the minimum essential for

effective maritime telecommunications and making recommendations on important issues involving maritime telecommunications.

MariTEL's Proposal to Serve as AIS Frequency Coordinator has been considered by RTCM's Board of Directors. Although MariTEL, Inc. is a member of RTCM, this organization does not support the appointment of MariTEL or any other organization as an AIS frequency coordinator. Frequency coordination for the AIS system is simply not necessary.

In coming to this conclusion, RTCM has considered the following:

- The AIS system is designed to operate on two primary frequencies, channels 87B and 88B in the maritime VHF band. Individual AIS units broadcast on these frequencies using a technique known as "Self-Organizing Time Division Multiple Access" (SOTDMA). As implied by the name, the system is self-organizing, with different time slots allocated to different transmitters automatically. A frequency coordinator could add nothing to this process.
- It is possible that channel 87B or 88B, or both might not be available for AIS operation in a particular area. In such a case, AIS units need to switch to different channels. These channels are designated on a permanent basis, and in Vessel Traffic Service areas where alternative channels might be in use, shore stations broadcast channel management messages which cause AIS units to use the proper channels with no operator intervention or any action that can be provided by a frequency coordinator. So

even if MariTEL prevails in its petition to prohibit the use of channels 87B and 88B under DA 03-3585, the services of a frequency coordinator seem to be unnecessary.

- It is unclear why MariTEL would need to process Maritime Mobile Service Identity (MMSI) applications. The Commission has reserved this function to itself for compulsory vessels through the licensing process, however, RTCM does not object to continuation of MariTEL's designation as a qualified entity to process MMSIs for voluntary vessels.

- It is not clear how MariTEL's proposed database would provide the Coast Guard and the Commission with information not already available through existing MMSI databases. It is also not clear how MariTEL would obtain information on the fitting of AIS equipment on vessels registered outside the United States. In any case, we leave the decision on the necessity of this information and how to obtain it, to the Coast Guard and the Commission.

For these reasons, RTCM recommends denial of MariTEL's proposal to serve as an AIS frequency coordinator.

For the Radio Technical Commission for Maritime Services



R. L. Markle
President